## Middleton, Keith

From: Michael Maher <mmaher@smbtrials.com>

**Sent:** Friday, October 29, 2021 11:44 AM

**To:** Middleton, Keith

**Cc:** Witt-Zielke, Jennifer; Schlautman, Scott; Kelly, Maureen **Subject:** Morton Response to USEPA Request For Documents.

Attachments: Morton Salt Annual Facility Inspection 2021.pdf; SiteTopoExhibit.pdf; Morton Salt Q3 Stormwater

Visual Evaluation R.pdf

Follow Up Flag: Follow up Flag Status: Flagged

Dear Mr. Middleton:

I am Mike Maher, outside counsel for Morton Salt, Inc. (Morton), responding to your request for documents.

Attached please find the following:

- 2021 Quarter 3 Stormwater Quarterly Visual Evaluation Form;
- Site topographical map; and
- Annual Facility Inspection Report, Jan 1, 2021 Dec 31, 2021.

Morton continues to examine its document repositories for additional responsive documents, but Covid-related issues and the recent company (Morton) purchase resulted in personnel reductions, which included document custodians. Morton has made internal changes to ensure future reports will be preserved and forwarded as requested. Morton provides the above documents while promising to continue its efforts to locate the additional records.

If you have further questions, please do not hesitate to contact me.

Sincerely,

Michael J. Maher, Partner Swanson, Martin & Bell, LLP 330 N. Wabash, 33<sup>rd</sup> Floor Chicago, IL 60611 312/923-8261

Fax: 312/321-0990

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